

UNITED STATES DISTRICT COURT

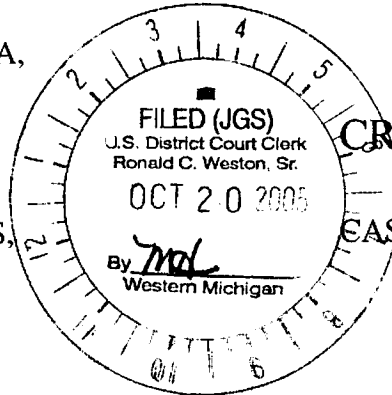
WESTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION

UNITED STATES OF AMERICA,

V.

RAYMOND WILLIAM ADAMS,
RONALD ADAMS, and
HERBURT CARTER

(Name and Address of Defendant)



CRIMINAL COMPLAINT

CASE NUMBER: 1:05-MJ-358

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about late 2004 to Oct. 16, 2005 in Antrim County, in the Western District of Michigan, Southern Division defendant(s), (Track Statutory Language Offense)

knowingly, intentionally an unlawfully combine, conspire, confederate and agree together, and with other persons both known and unknown, to distribute and possess with the intent to distribute heroin, a Schedule I controlled substance

in violation of Title 21 United States Code, Section(s) 846; 841(a)(1)

I further state that I am a(n) Special Agent with FBI and that this complaint is based on the following

Official Title

facts:

See attached Affidavit

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

[Signature]
Signature of Complainant

Sworn to before me and subscribed in my presence,

[Signature] at
Honorable JOSEPH G. SCOVILLE
Magistrate Judge
Name & Title of Judicial Officer

Grand Rapids, Michigan Date and Time Issued
OCT 20, 2005
Signature of Judicial Officer

AFFIDAVIT

Being duly sworn, Robert BirdSong deposes and says:

1. I am a Special Agent of the Federal Bureau of Investigation, (FBI), and have been so employed for approximately seventeen years. I am currently assigned to the Traverse City Resident Agency of the FBI. In accordance with my assigned duties I conduct investigations of drug trafficking organizations. This affidavit is submitted in support of a criminal complaint charging Raymond William Adams, (aka Ray-ray), Ronald Adams, (aka Bugs), and Herbert Carter, (aka) "K" with conspiracy with Intent to Distribute and Possess with intent to Distribute Heroin, a Class I Scheduled Controlled Substance, in violation of Title 21 U.S.C., Sections 846 and 841(a)(1).

2. During April of 2005 your affiant learned from D/Lt. Chester Wilson, Michigan State Police, Traverse Narcotics Team, MSP/TNT, that officers then assigned to TNT were investigating allegations of a heroin trafficking organization operating in Antrim County, Michigan. D/Lt. Wilson advised your affiant that the organization had been distributing heroin in and about Antrim County, Michigan since the latter months of 2004. D/Lt. Wilson advised your affiant that the suspected trafficking involved three or more individuals transporting heroin from the Detroit, Michigan metropolitan area to Antrim County, Michigan where it was being sold to local residents. Your affiant subsequently initiated an investigation based on the information relayed by D/Lt. Wilson and other TNT officers under his command.

3. During June of 2005 a cooperating witness, (CW), identified as CW-1, advised your affiant that three individuals, known to CW-1 as Raymond "Ray-ray" Adams, Ronald "Bugs" Adams, and Melvin "SP" Johnson, all of the Detroit, Michigan metropolitan area, had been

selling heroin to a number of individuals in Antrim County, Michigan. CW-1 was able to describe the method used by Ray Adams to prepare the heroin for distribution, based on the CW's observations, as well as the manner of packaging of the heroin prior to sale. This information was subsequently corroborated by other Confidential Witnesses as well as other persons not named or identified in this document but known to your affiant.

4. Among other information, CW-1 identified the Antrim County residence of Eric and Katy Belcher as one of the primary locations utilized by Ray Adams, Ronald Adams, Melvin "SP" Johnson, and others, to facilitate the sale of heroin in Antrim County, Michigan. That residence is located at 2653 Six Mile Lake Road, East Jordan, Echo Township, Michigan.

5. CW-1 advised your affiant that he/she had witnessed numerous persons arrive at the 2653 Six Mile Lake Road residence in order to purchase heroin from Katie and Eric Belcher.

6. During 2004 CW-1 also observed Eric Belcher travel from Antrim County, Michigan to the Detroit home of Ray Adams in order to purchase heroin. Belcher would then return with the heroin to Antrim County where he would sell some or all of the heroin to Antrim County residents and other persons.

7. During August of 2005 a second Cooperating Witness, (CW-2), advised your affiant that CW-2 is also familiar with heroin distribution in Antrim County, Michigan. CW-2 also knows a "Ray-ray", "SP", and "Bugs", and provided accurate physical descriptions of the men to your affiant, which were consistent with the descriptions provided by CW-1. CW-2 became aware of the sale of heroin by Ray Adams, Ronald "Bugs" Adams, and SP, as early as the latter months of 2004. CW-2 knows that these individuals resided in the Detroit area and traveled between Detroit, Michigan and Antrim County, Michigan in order to sell heroin. CW-2 has

purchased heroin directly from Ray Adams, Ronald "Bugs" Adams, and the Black Male known to CW-2 as SP in Antrim County, Michigan.

8. CW-2 has been to Detroit in the company of various persons, including Eric Belcher, and observed Eric Belcher and others purchase heroin from Ronald "Bugs" Adams in Detroit. CW-2 also observed Eric Belcher weigh the heroin he had purchased from Ronald "Bugs" Adams on a scale in his home, located at 2653 Six Mile Lake Road, East Jordan, Michigan, after returning from a heroin purchase in Detroit, Michigan.

9. A third CW, (CW-3), was also developed, and during October of 2005 advised your affiant that Eric and Katy Belcher had moved out of their residence on Six Mile Lake Road, in East Jordan, Michigan, and Ray "Ray-ray" Adams, Ronald "Bugs" Adams, and other black males had assumed occupancy of the residence. According to CW-3 the Belchers owed money to Ray Adams as the result of a heroin debt, and had sold their residence to Ray Adams as a result of that debt. CW-3, like CW-2 and CW-1, had traveled to Detroit with Eric Belcher and other persons, in order to purchase heroin from Raymond "Ray-ray" Adams. CW-3 observed Eric Belcher purchase heroin from Raymond Adams on at least one such trip. On this occasion, CW-3, Eric Belcher, and Raymond Adams returned to Antrim County with Raymond Adams.

10. CW-3 advised that numerous individuals were purchasing heroin from Ray Adams, and others, at the Six Mile Lake Road residence. In addition, CW-3 had observed weapons in the residence and in the possession of Ray Adams as well as Ronald "Bugs" Adams. CW-3 described these weapons as a .25 caliber semi automatic pistol, observed in the possession of Ray Adams; and a Glock semi-automatic pistol, possibly a 9mm, observed in the possession of

Ronald "Bugs" Adams. CW-3 also observed an 7.62mm SKS rifle to be in the residence, and in the possession of Ray Adams.

11. CW-3 advised that during September of 2005 he/she and another individual arrived at 2653 Six Mile Lake Road, for the purpose of purchasing heroin from Raymond Adams, and or Ronald "Bugs" Adams, or one of their associates. On this occasion CW-3 had \$600.00 on his person to effect the purchase. According to CW-3 Ron and Raymond Adams brandished weapons after taking the \$600.00 as payment for heroin, and refusing to deliver the heroin. According to CW-3, and confirmed by the second individual present, Raymond Adams and Ronald "Bugs" Adams, menaced the two individuals by brandishing their semi-automatic pistols and making verbal threats. Both CW-3 and the second individual state that the second individual fled the residence fearing for his life. According to CW-3, Raymond Adams and Ronald Adams then placed their pistols to his head, after which Raymond Adams assaulted CW-3 by striking him/her on the head with the pistol. According to CW-3, the assault was the result of Raymond Adam's belief that CW-3 had broken into the Six Mile Lake Road residence and stolen items belonging to Raymond Adams and his associates.

12. During October of 2005 TNT officers were able to introduce an Undercover Officer (UCO) into the residence located at 2653 Six Mile Road for the purpose of purchasing heroin. On three occasions during October 2005 the UCO, acting with a Confidential Informant, (CI), was able to purchase small amounts of suspected heroin from an individual identified only as "K" at 2653 Six Mile Lake Road.. The UCO was able to positively identify the black male introduced as "K" as Herburt NMN Carter, DOB:2/19/1985, of 1995 Hazelwood Street, Detroit, Michigan, based on an examination of a photograph.

13. On October 16, 2005 TNT officers, officers of the Antrim County Sheriff's Office, and your affiant, executed a search warrant issued by the 86th District Court, Antrim County, State of Michigan, on the residence located at 2653 Six Mile Lake Road, East Jordan, Michigan. Officers conducting the search found approximately nine packets of suspected heroin, several small suspected marijuana plants, electronic scales, approximately \$950.00 in cash, .25 caliber ammunition, .22 caliber ammunition, 7.62 mm ammunition, and numerous cell phones in the residence located at 2653 Six Mile Lake Road, East Jordan, Michigan. Among the cash found in the residence were pre-recorded bills from two of the three prior TNT UCO purchases of suspect heroin. Upon entry at the residence by police officers investigators located Raymond "Ray-ray" Adams, Ronald "Bugs" Adams, Herbert "K" Carter and other persons.


14. Ray Adams has been identified as Raymond William Adams, aka "Ray-ray", a black male, Date of Birth: 01/25/1982. Subsequent to his arrest, and after having been given his Miranda Warning, Raymond Adams advised your affiant that a .25 caliber pistol and an SKS rifle "came with the house".

15. Ron Adams has been identified as Ronald Adams, aka "Bugs", a black male, DOB: 10/04/1979.

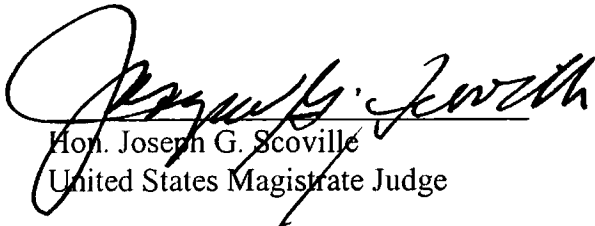
16. Herbert Carter has been identified as Herbert Carter, aka "K", a black male, Date of Birth: 02/19/1985.

17. I respectfully submit that there probable cause to believe that Raymond William Adams (a/k/a/ Ray-Ray), Ronald Adams (a/k/a "Bugs"), and Herbert Carter (a/k/a "K"), knowingly, intentionally, and unlawfully conspired to distribute and possess with the intent to

distribute heroin, a Schedule I controlled substance, in violation of 21 U.S.C. §§ 846 and 841(a)(1).


Robert BirdSong
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 20th day of October, 2005.


Hon. Joseph G. Scoville
United States Magistrate Judge